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**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:

CCA Construction, Inc.,<sup>1</sup>

Debtor.

(Hon. Christine M. Gravelle)

Chapter 11

Case No. 24-22548 (CMG)

**SUPPLEMENTAL DECLARATION OF BRETT S. THEISEN  
IN SUPPORT OF BML PROPERTIES, LTD.'S REPLY IN SUPPORT OF  
MOTION FOR ENTRY OF AN ORDER APPOINTING AN EXAMINER**

**BRETT S. THEISEN**, of full age, under penalty of perjury, hereby declares as follows:

1. I am an attorney at law admitted to practice in the State of New Jersey and a Director with Gibbons P.C. ("Gibbons"), located at 1 Gateway Center, Newark, NJ 07102, counsel to BML Properties, Ltd. ("BMLP") in the above-captioned bankruptcy proceeding (the "Chapter 11 Case").

2. I submit this declaration, in support of the *Reply of BML Properties, Ltd. in Support of Motion for Entry of an Order Appointing an Examiner* (the "Examiner Reply"), filed

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<sup>1</sup> The last four digits of CCA's federal tax identification number are 4862. CCA's service address for the purposes of this chapter 11 case is 445 South Street, Suite 310, Morristown, NJ 07960.

contemporaneously herewith.<sup>2</sup> Unless stated otherwise, I have personal knowledge of the facts set forth herein.

**Relevant Documents**

3. Attached hereto as Exhibit A is a true and correct excerpt of the Rough Transcript of the February 4, 2025 deposition of Evan Blum.

4. Attached hereto as Exhibit B is a true and correct excerpt of the Rough Transcript of the February 3, 2025 deposition of Elizabeth Abrams.

5. Attached hereto as Exhibit C is a true and correct excerpt of the Rough Transcript of the February 5, 2025 deposition of JiChao Xu.

6. Attached hereto as Exhibit D is a true and correct copy of Respondent BML Properties, Ltd.'s appellate brief, dated January 29, 2025.

7. Attached hereto as Exhibit E is a true and correct copy of Appellant China Construction America, Inc.'s reply brief, dated February 7, 2025.

I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief.

Executed on: February 10, 2025

/s/ Brett S. Theisen  
Brett S. Theisen

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<sup>2</sup> Capitalized terms used herein but not defined have the meanings ascribed to them in the Examiner Reply.